

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE: Mary Stravinski a/k/a Mary Crawley
Debtor(s)**

BK NO. 22-01642 MJC

**Rocket Mortgage, LLC f/k/a Quicken Loans, LLC
Movant**

Chapter 13

vs.

Hearing Date: N/A

**Mary Stravinski a/k/a Mary Crawley
Respondent(s)**

**OBJECTION OF ROCKET MORTGAGE, LLC F/K/A QUICKEN LOANS, LLC
TO CONFIRMATION OF CHAPTER 13 PLAN**

Rocket Mortgage, LLC f/k/a Quicken Loans, LLC (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On September 27, 2022, Secured Creditor filed a secured proof of claim setting forth pre-petition arrears in the amount of \$973.81.
2. Debtor's Plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$973.81, and does not provide sufficient funding to pay said claim including present value interest.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.

WHEREFORE, the Secured Creditor, Rocket Mortgage, LLC f/k/a Quicken Loans, LLC, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: October 5, 2022

By: /s/ Brian C. Nicholas, Esquire

Brian C. Nicholas, Esquire
BNicholas@kmlawgroup.com
Attorney I.D. No. 317240
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106
Phone: 412-430-3594
Attorney for Movant/Applicant